

REMARKS

Claims 1-45 were previously pending in this patent application. Claims 7, 20, and 39 stand rejected. Although the Office Action refers to Claim 1 as being rejected, the cited claim language is from Claim 7. Claims 8-13, 21-26, and 40-45 are objected to. Claims 1-6, 14-19, and 27-38 are allowed. Herein, Claims 7, 20, and 39 have been amended. Accordingly, after this Amendment and Response, Claims 1-45 remain pending in this patent application. Further examination and reconsideration in view of the claims, remarks, and arguments set forth below is respectfully requested.

35 U.S.C. Section 103(a) Rejections

Claims 7, 20, and 39 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant Admitted Prior Art (hereafter AAPA) in view of Rochberger et al., U.S. Patent No. 6,456,600 (hereafter Rochberger). These rejections are respectfully traversed. Although the Office Action refers to Claim 1 as being rejected, the cited claim language is from Claim 7.

Independent Claim 7 recites:

A method of diagramming a network having a plurality of devices, comprising the steps of:

a) determining a plurality of hierarchical layers for said network, wherein said devices are arranged in said hierarchical layers;

- b) determining one or more groups in each hierarchical layer, wherein each group includes at least one device; and
- c) forming a multi-layered cross-sectional diagram corresponding to said network, wherein ***said multi-layered cross-sectional diagram has a plurality of cross-sectional representations which are similar to each other***, wherein said plurality of ***cross-sectional representations have a plurality of sizes***, and wherein each ***cross-sectional representation is adapted to visually represent a group from a hierarchical layer and is adapted to visually represent one or more other groups from another hierarchical layer***. (emphasis added)

It is respectfully asserted that the combination of AAPA and Rochberger does not teach, suggest, or motivate the present invention as recited in Independent Claim 7. In particular, the Independent Claim 7 recites the limitations "***said multi-layered cross-sectional diagram has a plurality of cross-sectional representations which are similar to each other***" (emphasis added), "***cross-sectional representations have a plurality of sizes***" (emphasis added), and "***cross-sectional representation is adapted to visually represent a group from a hierarchical layer and is adapted to visually represent one or more other groups from another hierarchical layer***" (emphasis added). Moreover, the Office Action states that the AAPA fails to disclose the cited limitations but refers to Rochberger as disclosing the cited limitations. It is respectfully submitted that Rochberger fails to disclose the cited limitations. While Independent Claim 7 recites a multi-layered cross-sectional diagram, cross-sectional representations, and group of devices in a plurality of hierarchical layers, Figure 1 of Rochberger depicts a diagram of a network, peer groups, logical group nodes, nodes, and two levels of hierarchy. The Office

Action never specifies that Rochberger teaches, suggests, or motivates the cross-sectional representations of Independent Claim 7. A peer group is a collection of nodes while a logical group node is an abstraction of a peer group for the purpose of representing that peer group in a higher hierarchical level. [Rochberger; Col. 9, lines 8-15; Col. 10, lines 15-22].

While the Office Action states that “peer groups have plurality of sizes” and that “the two-level hierarchy is adapted to represent a group from a hierarchical layer and one group from another hierarchical layer”, there is no mention that Rochberger has a plurality of a particular element, wherein each particular element has the following properties of the cross-sectional representation: each is similar to each other, each is one of a plurality of sizes, and each is adapted to visually represent a group from a hierarchical layer and is adapted to visually represent one or more other groups from another hierarchical layer. Even though the peer groups may have a plurality of sizes, the peer groups are not similar to each other and only visually represent a collection of nodes from one hierarchical layer. For example, peer group A has logical group nodes A.1, A.2, A.3, and A.4 from a hierarchical layer but fails to visually represent peer groups or nodes from the lower hierarchical layer since each logical group node A.1, A.2, A.3, and A.4 is simply an empty round circle or an abstraction of a peer group from the lower hierarchical layer.

Furthermore, the two-level hierarchy of Rochberger's Figure 1 is the diagram of the network. Rochberger fails to disclose a diagram and cross-sectional representations as separate elements in Figure 1. That is, the diagram does not have a plurality of cross-sectional representations, as in the invention of Independent Claim 7. More importantly, each cross-sectional representation is adapted to visually represent a group from a hierarchical layer and is adapted to visually represent one or more other groups from another hierarchical layer. The two-level hierarchy of Rochberger's Figure 1 shows groups in a hierarchical layer instead of being adapted to visually represent groups from a hierarchical layer and shows other groups in another hierarchical layer instead of being adapted to visually represent other groups from another hierarchical layer.

As described above, the combination of AAPA and Rochberger does not teach, suggest, or motivate the cited claim limitations of Independent Claim 7. Therefore, it is respectfully submitted that Independent Claim 7 is patentable over the combination of AAPA and Rochberger and is in condition for allowance.

The objected Dependent Claims 8-13 are dependent on allowable Independent Claim 7, which is allowable over the combination of AAPA and Rochberger. Hence, it is respectfully submitted that the objected Dependent Claims 8-13 are patentable over the combination of AAPA and Rochberger for the reasons discussed above.

With respect to Independent Claims 20 and 39, it is respectfully submitted that Independent Claims 20 and 39 recite similar limitations as in Independent Claim 7. In particular, Independent Claim 20 recites the limitations "***said multi-layered cross-sectional diagram has a plurality of cross-sectional representations which are similar to each other***" (emphasis added), "***cross-sectional representations have a plurality of sizes***" (emphasis added), and "***cross-sectional representation is adapted to visually represent a group from a hierarchical layer and is adapted to visually represent one or more other groups from another hierarchical layer***" (emphasis added). Further, Independent Claim 39 recites the limitations "***said multi-layered cross-sectional diagram has a plurality of cross-sectional representations which are similar to each other***" (emphasis added), "***cross-sectional representations have a plurality of sizes***" (emphasis added), and "***cross-sectional representation is adapted to visually represent a group from a hierarchical layer and is adapted to visually represent one or more other groups from another hierarchical layer***" (emphasis added). The combination of AAPA and Rochberger does not teach, suggest, or motivate the cited claim limitations of Independent Claims 20 and 39. Therefore, it is respectfully submitted that Independent Claims 20 and 39 are patentable over the

combination of AAPA and Rochberger and are in condition for allowance for reasons discussed in connection with Independent Claim 7.

The objected Dependent Claims 21-26 and the objected Dependent Claims 40-45 are dependent on allowable Independent Claims 20 and 39 respectively, which are allowable over the combination of AAPA and Rochberger. Hence, it is respectfully submitted that the objected Dependent Claims 21-26 and the objected Dependent Claims 40-45 are patentable over the combination of AAPA and Rochberger for the reasons discussed above.

CONCLUSION

It is respectfully submitted that the above claims, arguments and remarks overcome all rejections and objections. All remaining claims (Claims 1-45) are neither anticipated nor obvious in view of the cited references. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 1-45) are in condition for allowance.

The Examiner is urged to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

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Respectfully submitted,

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